

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

NO. CR18-136 JLR

v.

JEFFERY DOUGLAS MANN  
KENNEDY WESTON  
COREY MOSEY  
DERRICK QUINTANA  
JOSHUA NEWMAN,

Defendants.

~~[PROPOSED]~~ PROTECTIVE ORDER



This matter, having come to the Court's attention on the Stipulated Motion for Protective Order submitted by the United States of America and Defendants JEFFERY DOUGLAS MANN, KENNEDY WESTON, COREY MOSEY, JOSHUA NEWMAN and DERRICK QUINTANA, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The United States will make available copies of Protected Materials, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Materials is limited to the defense

[PROPOSED] PROTECTIVE ORDER  
*United States v. Mann et al.*, CR18-136 JLR - 1

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WA 98101  
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1 attorneys of record, and investigators, paralegals, law clerks, experts and assistants for the  
2 defense attorneys of record (hereinafter collectively referred to as members of the defense  
3 team). Protected Materials will be marked and labeled as "Protected Material," including  
4 but not limited to:

- 5 a. Audio, video, photographic, and written recordings of witnesses and  
6 defendants;
- 7 b. Witness and defendant statements, including but not limited to  
8 reports of law enforcement officers memorializing such statements;  
9 and
- 10 c. Personal information related to witnesses and defendants, including  
11 any documents provided by the government containing personal  
12 information about or related to any witnesses or defendants.

13 As used in this Order, the term "personal information" includes a person's full  
14 name, picture or likeness, voice recording, date of birth, Social Security number (or other  
15 identification information), driver's license number, address, telephone number, location  
16 of residence or employment, school records, juvenile criminal records, and other  
17 confidential information.

18 2. Scope of Review of Protected Material

19 The attorneys of record and members of the defense teams may display and review  
20 the Protected Material with Defendants. The attorneys of record and members of the  
21 defense teams agree that providing copies of the Protected Material to Defendants and  
22 other persons is prohibited and they will not duplicate or provide copies of Protected  
23 Material to Defendants and other persons. The only exception to this prohibition is that  
24 the attorneys of record and members of the defense teams may provide electronic copies  
25 of Protected Material to the Federal Detention Center at SeaTac, Washington, for use in a  
26 controlled environment by those Defendants who are currently in custody at the FDC.

27 The United States Attorney's Office for the Western District of Washington is  
28 similarly allowed to display and review the Protected Material with lay witnesses, but is

1 otherwise prohibited from providing copies of the Protected Material to lay witnesses, i.e.  
2 non-law enforcement witnesses.

3       3.     Consent to Terms of Protective Order

4       Members of each defense team shall provide written consent and  
5 acknowledgement that they will each be bound by the terms and conditions of this  
6 Protective Order. The written consent need not be disclosed or produced to the United  
7 States unless requested by the Assistant United States Attorney and ordered by the Court.

8       4.     Parties' Reciprocal Discovery Obligations

9       Nothing in this order should be construed as imposing any discovery obligations  
10 on the government or Defendants that are different from those imposed by statute, case  
11 law, the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

12       5.     Filing of Protected Material

13       Any Protected Material that is filed with the Court in connection with pre-trial  
14 motions, trial, sentencing, or other matter before this Court, shall be filed under seal and  
15 shall remain sealed until otherwise ordered by this Court. This does not entitle either  
16 party to seal their filings as a matter of course. The parties are required to comply in all  
17 respects to the relevant local and federal rules of criminal procedure pertaining to the  
18 sealing of court documents.

19       6.     Nontermination

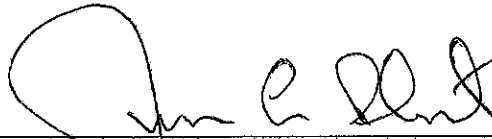
20       The provisions of this Order shall not terminate at the conclusion of this  
21 prosecution.

22       7.     Violation of Protective Order

23       Upon any violation of a term or condition of this Order by any Defendant, his/her  
24 attorney of record, any member of his/her defense team, or any attorney for the United  
25 States Attorney's Office for the Western District of Washington, that person may be held  
26 in contempt of court, and/or may be subject to monetary or other sanctions as deemed  
27 appropriate by this Court.

1 If any Defendant violates any term or condition of this Order, the United States  
2 reserves its right to seek a sentencing enhancement for obstruction of justice, or to file  
3 any criminal charges relating to that Defendant's violation.

4 DATED this 27<sup>th</sup> day of November 2018.

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8 The Honorable James L. Robart  
9 U.S. DISTRICT COURT JUDGE  
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